

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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JOHN CARMACK,

Plaintiff,

v.

Case No. 22-CV-695

SNAP-ON INCORPORATED,

Defendant.

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**PLAINTIFF'S UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiff Carmack respectfully moves this Court for the entry of the proposed Preliminary Approval Order submitted herewith, which seeks the preliminary approval of a proposed class action settlement (the "Settlement") and certification of a proposed settlement class (the "Settlement Class") as defined therein. In support of this request, Plaintiff states and presents the following:

1. The terms of the Settlement are set forth in the Settlement Agreement and Release dated January 20, 2023, attached as "Exhibit 1" to Plaintiffs' Memorandum of Law in Support of Their Unopposed Motion for Preliminary Approval of the Class Action Settlement (the "Memorandum"), filed contemporaneously herewith.
2. The relief sought in this Motion is supported by the Memorandum and the Declaration of Nicholas A. Migliaccio, which is attached as "Exhibit 2" to the Memorandum.
3. Defendant, Snap-on, Incorporated does not oppose the relief requested in this Motion.

WHEREFORE, Plaintiff respectfully requests that the Court enter the proposed Order Granting Preliminary Approval of the Class Action Settlement.

Dated: January 20, 2023

Respectfully submitted,

s/ LARRY A. JOHNSON

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/s/ Nicholas A. Migliaccio

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*Proposed Class Counsel for Plaintiff and the Proposed Settlement Class*